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*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

CHINA ENERGY CORPORATION, a Nevada  
corporation,

Plaintiff,

vs.

ALAN T. HILL, ELENA SAMMONS,  
MICHAEL SAMMONS, THOMAS S.  
VREDEVOOGD, TRUSTEE OF THE  
KIMBERLY J. VREDEVOOGD TRUST UA  
1007/2008, JUN HE, and RANDY DOCK  
FLOYD,

Defendants.

CASE NO. 3:13-cv-00562-MMD-VPC

**STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME FOR CHINA  
ENERGY CORPORATION TO FILE ITS REPLY TO  
MOTION TO DISMISS (DKT. NO. 212)**

**(FIRST REQUEST)**

1 Plaintiff, China Energy Corporation ("CEC"), by and through its counsel of record,  
2 Gordon Silver and Ulmer & Berne LLP, and Defendant Michael Sammons, in proper person,  
3 hereby stipulate and agree as follows:

4 1. Michael Sammons filed a Motion to Dismiss for Want of Jurisdiction (Dkt. No. 212) on  
5 May 12, 2014. CEC's response is currently due on Thursday, May 29, 2014.

6 2. CEC has requested additional time to file its reply points and authorities. Therefore, the  
7 parties stipulate and agree that CEC shall have up to and including Friday, June 6, 2014, in  
8 which to file its Opposition to the Motion to Dismiss (Dkt. No. 212).


9 4. CEC has requested this extension in light counsel's obligations and deadlines in other  
10 cases. This extension is not being requested for the purpose of delay.

11 5. This is the first stipulation regarding an extension of time for CEC to file its Opposition  
12 to Michael Sammons's Motion to Dismiss (Dkt. No. 212).

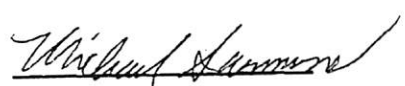
13  
14 DATED this 22nd day of May, 2014.

DATED this 22<sup>nd</sup> day of May, 2014.

15 GORDON SILVER

16  
17 By:   
18 Michael N. Feder  
19 Justin J. Bustos  
20 Anjali D. Webster  
21 100 West Liberty Street  
22 Suite 940  
23 Reno, Nevada 89501

24 Attorneys for China Energy Corporation

17 By:   
18 Michael Sammons  
19 15706 Seekers St  
20 San Antonio, TX 78255

21 Defendant in Proper Person

**ORDER**

Pursuant to the foregoing Stipulation, IT IS HEREBY ORDERED that Plaintiff China Energy Corporation shall have up to and including Friday, June 6, 2014, in which to file its opposition to the Motion to Dismiss (Dkt. No. 212)

IT IS SO ORDERED

DATED this \_\_\_\_\_ day of May, 2014.

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UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

The undersigned, an employee of Gordon Silver, hereby certifies that she served a copy of  
**STIPULATION TO EXTEND TIME** via CM/ECF on May 22, 2014 to the following  
individuals:

Richard L. Elmore, Esq.  
Holland & Hart  
5441 Kietzke Lane, 2<sup>nd</sup> Floor  
Reno, NV 89511  
*Attorney for Thomas S. Vredevoogd,  
Trustee of the Kimberly J. Vredevoogd  
Trust UA 1007/2008*

Michael Sammons  
15706 Seekers St  
San Antonio, TX 78255  
*Defendant in Proper Person*

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Meredith Lees  
Rebecca Beers  
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Birmingham, AL 35209

And by U.S. Mail, postage prepaid, to the following individuals:

Elena Sammons  
15706 Seekers St  
San Antonio, TX 78255  
*Defendant in Proper Person*

Randy Dock Floyd  
4000 Goff Road  
Aynor, SC 29551  
*Defendant in Proper Person*

Jun He  
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An employee of GORDON SILVER